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NO 11.2

RESPONSES TO WRITTEN COMMENTS ON THE MODIFIED INITIAL STUDY FOR THE UNIVERSAL CITY STATION

Prepared for

**LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION AUTHORITY**

JUNE 1994
R871

Prepared by

ENGINEERING-SCIENCE
DESIGN • RESEARCH • PLANNING
199 SOUTH LOS ROBLES AVENUE • P.O. BOX 7056 • PASADENA, CALIFORNIA 91101

30713846

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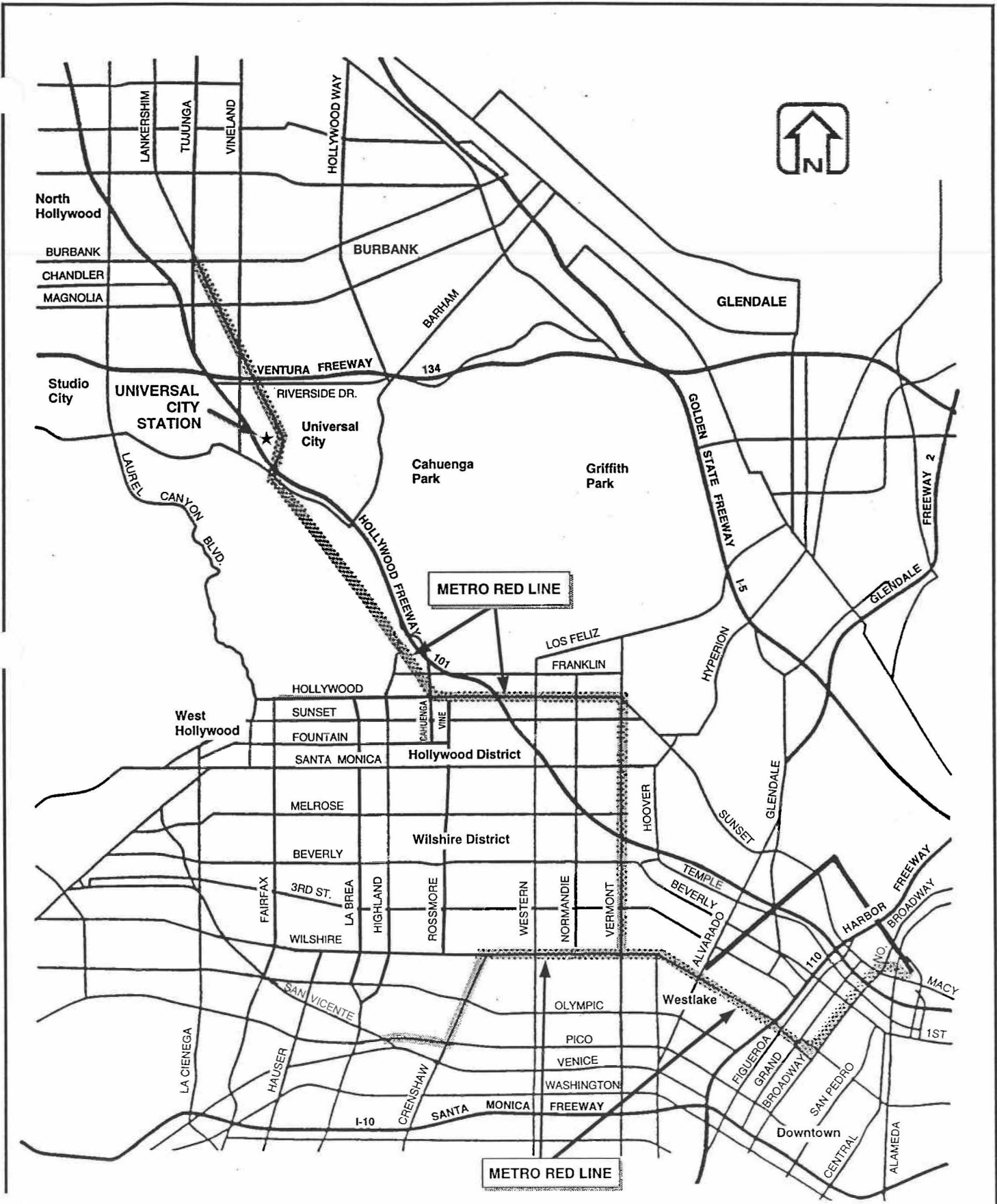
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SECTION 1

PROJECT DESCRIPTION

1.1 PROJECT LOCATION AND DESCRIPTION

The Universal City Station site and adjacent facilities are located on the corner of Lankershim Boulevard and the Hollywood Freeway (Highway 101) intersection. The site is bounded by Lankershim Boulevard on the east, Bluffside Drive on the west, Highway 101 on the south, and the Los Angeles River on the north. Figure 1.1 illustrates the regional location and project site. The detailed description of this project is provided in Section 1 of the Modified Initial Study. This description discusses improvements analyzed in the 1989 SEIS/SEIR, revised station box and crossover, actions leading to changes in the project, and the proposed new changes at the Universal City Station site. These new changes include improvements in circulation and parking, construction of access shaft, acquisition of land, and future development plans.



Regional Location Map
Figure 1-1

Source: Metro Rail

SECTION 2

COMMENTS ON THE MODIFIED INITIAL STUDY AND ADDENDUM

The California Environmental Quality Act (CEQA) provides the opportunity for any person, organization or governmental agency to submit comments to the Lead Agency. The official public review period for the Universal City Modified Initial Study and Addendum began May 21, 1994, and ended June 20, 1994. During that time, two letters were received.

In this section, the letters are presented and numbered in chronological order by date received. Specific sentences containing substantive comments (i.e., comments that present new data, questions, or new issues bearing on the environmental effect of the proposed project or alternatives) are highlighted in each comment letter using margin bars. Individual substantive comments within each letter have been assigned sequential "comment numbers" (i.e., 1-3 is the third comment in the first letter). Responses in Section 3 have been assigned corresponding comment numbers for identification purposes.

ERICKSON, BEASLEY, HEWITT & WILSON

491 NINTH STREET
OAKLAND, CALIFORNIA 94607

(510) 839-3448

FACSIMILE (510) 839-1922

SAN FRANCISCO OFFICE

CITICORP CENTER

ONE SANDHORN STREET, SUITE 2000
SAN FRANCISCO, CALIFORNIA 94104

(415) 391-4022
FACSIMILE (415) 391-4000

REPLY TO OAKLAND

JOHN M. ERICKSON
ALICE M. BEASLEY
HENRY B. HEWITT
EDWIN J. WILSON, JR.
BESS J. ANDERSON
TODD SOLEY
WILLIAM A. BARNES
AARON KAUFMANN
ANA L. AVENDAÑO

OF COUNSEL

EDWIN J. WILSON
FELLOW
AMERICAN COLLEGE
OF TRIAL LAWYERS

June 18, 1994

By facsimile and mail

Mr. James L. Sowell
Manager, Environmental Compliance
Los Angeles Metropolitan Transportation Authority
818 W. Seventh St.
Los Angeles, CA 90017

Re: Addendum to FEIS/FEIR at Universal City Station site of Metro Rail Red Line Project

Dear Mr. Sowell:

I am the attorney for Marcia Lucas Rodrigues who owns the property located at 3849 - 3875 Lankershim Boulevard. This letter is written to raise our objections to the Addendum and Modified Initial Study prepared by the MTA concerning changes to the Universal City Station of the Metro Rail Red Line Project. I request that these comments be made a part of the record. I would also like to request that I be placed on the circulation list to receive any documents or decisions that are disseminated concerning this project.

Objections

1. Our initial objection is to the use of a cursory "Addendum" process to make what are major changes in many aspects of the Universal City station site. The public has been completely cut out of the opportunity to have an impact on the changes before they were adopted. (See Comment No. 2 below). Now by the use of this abbreviated addendum rather than a Supplementary EIR/EIS, the Agency is avoiding seeking and obtaining comments from a wide variety of the public and other public agencies as to these changes. This is a misuse of the CEQA/NEPA process.

2. The Addendum and Modified Initial Study are inaccurate and incomplete in a number of respects. First, your letter of May 21, 1994 and the Addendum itself are false and misleading when they refer to the changes as "proposed."

1-1

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[See, e.g. the May 26, 1994 memorandum from Edward McSpedon to the RCC Board which states that the changes were "approved in concept" by MTA on February 23, 1994 in a Memorandum of Understanding; see also, the Addendum at p. 1 which states that the Addendum will be considered by the MTA Board "prior to project approval."] In fact the Board and MCA have already signed the Memorandum of Understanding committing the MTA to what the MOU calls the "Revised Adopted Station. By its own terms, this agreement is a "legally binding" instrument. These are not, therefore, "proposed" changes which the MTA is objectively evaluating for their potential environmental effects. Rather, these are changes which the MTA is now contractually obligated to undertake regardless of their environmental consequences. Absolutely no environmental review of the provisions and changes incorporated in the MOU was undertaken by MTA before entering into this binding agreement with MCA. CEQA mandates that such review occur before the agency commits itself to changes which may have significant environmental consequences. The MTA has made it known that it is in a hurry to begin construction of the revised project. In doing so, however, I believe you are ignoring the special responsibility of public trust that is invested in agencies that are allowed to act as lead agencies for their own projects. The sequence of events outlined above and the flimsy and strained rationalizations used to characterize as minor adjustments what are truly massive changes in this project gives rise to substantial doubt that the MTA faithfully discharged its public trust in regard to this Revised Station site.

1-2

3. Many of the changes required by the MOU are never analyzed in the Modified Initial Study or the Addendum. For example: The MOU widens Lankershim from six lanes to ten lanes. It adds a new Riverton on-ramp and an off-ramp to the 101 Freeway; whereas the previously adopted project had removed the Riverton off-ramp. The MOU approves in advance MCA's construction of a People Mover with a direct hook-up to the Metro Rail Line. MCA is given sole discretion as to the "design, construction and operation" of this People Mover. Yet on the Environmental Checklist, the impact potential of these modifications to traffic circulation are not noted and absolutely no review is conducted of these circulation elements.

1-3

1-4

1-5

The changed roadway and freeway improvements have a single purpose: to make it easy for cars to come to MCA's Universal Studios. But the effect of these taxpayer financed changes on local traffic and air quality and their growth inducing potential do not rate even a comment in the Modified Initial Study and the Addendum. It is clear that with the addition of the new portals, the People Mover, the changes in traffic circulation vis a vis the freeway and massive reductions in commuter parking at the station, the purpose and nature of the Project has been changed from a Metro Rail

1-6

1-7

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station designed to transport people from the Valley to downtown Los Angeles. Rather the Project is now oriented as a magnet to draw people from downtown Los Angeles to Universal Studios. This major change in the Project is completely ignored by the Modified Initial Study and Addendum. It is also a clear shift away from the policy announced in the FEIR/FEIS in which Metro Rail indicated that it would assume financial responsibility only for traffic mitigation measures that were "directly and solely necessary because of the Metro Rail Project." (FEIR/FEIS at p. 6-84).

1-8

4. Those effects which are found to be potentially significant are dismissed as insignificant by a collection of rationalizations that cannot withstand scrutiny. For example, according to the SEIR/SEIS, the Universal City Station would be serviced by "three large surface parking lots." (SEIR/SEIS at p. 2-1-39). The parking was further described in this supplemental EIR as follows:

1-9

Park-and-ride patrons will occupy 1,175 spaces, while kiss-and-ride patrons will use 40 spaces. Ultimately, 2,500 spaces will be provided in surface and structure parking.

SEIR/SEIS at p. 2-1-39 (emphasis added).

The revised project eliminates one of these park-and-ride lots and puts a cap on station parking at 880 spaces. Additionally, the MOU specifically prohibits MTA from ever constructing a parking garage on the property. (This limitation is not disclosed in the Modified Initial Study or Addendum. Moreover, the Study uses misleading data by failing to acknowledge that 340 spaces have been cut from the station design). Although the Modified Initial Study recognizes that the Revised Station will result in a deficit of 1220 parking spaces at this station, it engages in sleight of hand to avoid supplementing the EIR/EIS by manipulating the industry standards that MTA employed in the original environmental documents. Thus, for example, a magical 700 spaces suddenly materializes somewhere "in the station area" by abandoning the industry standard whereby 90% of occupancy of parking spaces is assumed to be full capacity.¹ Instead the Study uses the technically flawed assumption that 100% of all potentially

1-10

¹ Industry standard considers 90% occupancy to be the "practical capacity" of the theoretically available parking supply because in an urban area about 10 percent of the supply is temporarily unavailable – due to construction, oversize vehicles, improperly parked vehicles, dumpsters and refuse removal, etc. -- or is in practice unfindable.

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available spaces will be available for use by Metro Rail patrons. Although the initial parking at the Revised Station has been cut by 30% (and the ultimate parking by two-thirds), by manipulating the data in this manner, the study misleadingly concludes that this parking reduction will result in a deficiency in spaces in the year 2000 of only 3%.

1-10

Other equally flawed rationalizations are also put forth as to why eliminating almost two thirds of the parking spaces that would have been provided by the parking structure is merely a "technical" change. For example, the agency appears to no longer feel compelled to use "conservative" assumptions to study environmental consequences even though this remains the legal standard. Another example, is the empty promise that the deficit will be ameliorated in an unspecified fashion by "shared" parking with Universal City. As the February 10, 1994 report by the Department of Transportation noted, the activity at Universal Studios is "365 days a year, and all day and all night". Although Universal may well usurp patron parking (thus creating even greater deficits) it is difficult to see any potential for a reverse benefit for MTA's riders.

1-11
1-12

The parking section "mitigations" contain classic double talk. For example, reduced station parking is justified by the fact that new air quality standards will reduce employee parking demand. A less biased report would have acknowledged that if employees are prevented from driving their cars to work due to Regulation 15, there will be more propensity to drive to Metro stations and take public transit, thus producing greater demands for station parking not less. (Note that the original FEIS/FEIR identified a parking deficit at the Universal City site of 2,063 spaces. FEIS/FEIR at p. 3-29).

1-13

The study concludes that "even if the deficiency at Universal City were as projected in previous studies, the environmental impacts at Universal City would be the same as the parking impacts discussed in the 1989 SEIS/SEIR for the original project, and the same mitigation measures apply." This totally ignores the fact that the primary parking mitigation measure adopted by the SEIS/SEIR was an initial 1,175 surface parking spaces and an eventual increase to a 2,500 space parking garage. Because of MTA's contractual commitment to MCA to limit parking to no more than 880 spaces, this mitigation measure can never be fulfilled regardless of how bad parking congestion may become in the future at this station.

1-14

5. As with the discussion on parking, the Modified Initial Study glosses over other areas where even the study admits that there is a potential for significant environmental impacts. With respect to the loss to the housing stock, for example, the study states that there is no significance to a loss of an additional 72 housing units

1-15

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because the residents of that complex have expressed a desire to be relocated. The significance, however, lies not only to these residents but to the loss to the community in general of housing stock. Moreover, virtually all of the residential units displaced by the Project are at the Universal Station site. Particularly in light of the loss of both residential and commercial units in the earthquake, a 50% increase in lost housing should not be so lightly glossed over by the Agency.

1-15

6. The Addendum and Modified Initial Study also reveals significant impact on parkland never studied in the original environmental review. The study notes that:

The project will directly affect South Weddington Park and Campo de Cahuenga. This is a new impact which was not anticipated in the original project. The development of the project will require land takes from these parks and the MTA has indicated its commitment to conduct a Section 4(f) evaluation to comply with the 1966 Department of Transportation Act.

1-16

Despite the fact that the Study identifies the acquisition of this park land as having the potential for a significant environmental impact and despite the fact that this acquisition was not considered in the initial environmental review, the study still comes to the conclusion that no revision is required to the SEIS/SEIR. This is in direct contradiction to CEQA. See, CEQA Guidelines §§ 15162, 15164 (a). Moreover, federal law requires that the potential impact be investigated before Project approval. By committing to the widening of Lankershim Boulevard before undertaking such review, the MTA has failed to comply with Section 4(f) of the Act.

As noted above, CEQA limits the use of an Addendum to minor technical changes in projects. In the present case, the totality of the approved changes is approximately \$52 million.² Regardless of their merits, such massive shifts can hardly be called "minor technical changes".

1-17

Unfortunately, the Addendum and Modified Initial Study bear all the earmarks of a document which was put together to justify a decision that has already

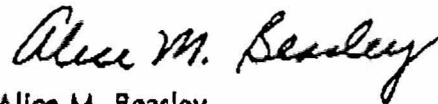
² MTA has previously estimated the cost of the road improvements at \$16 million. Elimination of the parking garage amounts to another \$16 million change. Additionally, MTA has previously estimated the cost of the People Mover as \$20 million.

ERICKSON, BEASLEY, HEWITT & WILSON

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been made. It is flawed technologically and defeats the spirit and purpose of the CEQA process. We would request that rather than trying to paper over the many changes to the Universal Station site that the MTA stop and take an honest look at the environmental consequences of the Revised Station. One of the conclusions that it may reach is that the MCA proposal to move the station site is still a viable alternative.

Very truly yours,



Alice M. Beasley

AMB:me

cc: Federal Transit Administration

LAW OFFICES

KARNO, SCHWARTZ, FRIEDMAN, SHAFRON & WARREN

A FIRM OF ATTORNEYS INCLUDING PROFESSIONAL CORPORATIONS

NURTON S. KARNO*
MARSHALL N. SCHWARTZ*
KENNETH L. FRIEDMAN*
SHELLY JAY SHAFRON*
LARK W. WARREN*
ROBERT M. SOMERS
STANLEY E. HEYMAN
ANDREW N. SHORET
RANDY S. SNYDER
MICHAEL G. WITMPE
KEVIN DAVID KAMMER
VALERIE A. KARNO

3855 VENTURA BOULEVARD, PENTHOUSE SUITE
ENCINO, CALIFORNIA 91418-2808
(518) 981-3400 / (213) 872-1800
FAX (213) 872-1278

CALABASAS OFFICE
23077 CALABASAS ROAD
SUITE 340
CALABASAS, CALIFORNIA 91302-1594
(818) 277-7000
FAX (818) 222-7900

June 17, 1994

OF COUNSEL
RICHARD B. SOMERS

*A PROFESSIONAL CORPORATION
ALSO ADMITTED TO PRACTICE IN NEW YORK

Via Messenger and
Certified Mail, Return Receipt Requested

James L. Sowell, Manager
Environmental Compliance
Los Angeles County Metropolitan
Transportation Authority
818 West 7th Street
Los Angeles, California 90017

Re: Metro Rail Red-Line Rapid Transit Project
Modified Initial Study Addendum
Parcel Nos. C3-750, C3-752, and C3-757

Dear Mr. Sowell:

This office represents Chelsea Studios, Inc. ("Chelsea"), one of the tenants located at 3859 Lankershim Boulevard, Studio City, California 91604. Please regard this letter on behalf of Chelsea as a formal objection to the Los Angeles County Metropolitan Transportation Authority ("MTA") taking of the subject property. The basis for this objection is that there has not been a proper environmental review of the significant changes to the project, in accordance with the California Environmental Control Act ("CEQA"). In particular, Chelsea has the following concerns:

2-1

When the Resolution of Necessity was adopted by MTA on or about August 25, 1993, the acquisition of the subject real property, and in particular the Universal City Station -- "Metro Rail Red-Line Transit Project" (the "Project") -- was purported to be as defined in the Final Supplemental Final EIR/EIS. The environmental documents prepared in 1983 and 1989 describe the Project, the environmental consequences of the Project and proposed mitigations. Following widespread public circulation of these documents as required by law, the project as defined in these documents was apparently approved. Although unknown to Chelsea, while MTA was adopting the Resolution of Necessity, it was simultaneously conducting secret negotiations with a major private land owner at the University City site, MCA, Inc. ("MCA"), which was lobbying to move the station to a location on MCA's property at Universal Studios. On or about February 23, 1994, the MTA Board made a decision not to

2-2

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move the proposed station site, but instead to make major changes to the Project to accommodate MCA's interest. At this Board meeting, MTA approved a Memorandum of Understanding ("MOU") between itself and MCA in which the MOU is recited to be a "legally binding instrument" written in what appears to be mandatory language. The MOU was executed by certain parties thereafter on or about February 25 and March 7, respectively. The MOU commits the MTA to major changes in parking, traffic circulation, land acquisition and other elements at the Universal City Station site, including MTA's advanced approval of a "People Mover" to be constructed by MCA at the Station site. The "People Mover" is recited in the MOU to be in MCA's sole discretion as to its "design, construction, and operation." In fact, MCA has sole discretion to determine whether the "People Mover" is to be built in the first place. Moreover, no standards for this project are contained in the MOU.

2-3

Further, Chelsea believes that the MOU was adopted by the MTA at its February 23, 1994 Board meeting with no public notice. We believe that approval of the document never appeared on the agenda of that meeting and no advance circulation of the MOU was made to the public at large or to interested parties such as Chelsea prior to the meeting. Despite the fact that, by its own terms, the MOU commits the MTA to a new revised adopted station site, no environmental review was conducted in advance of the MTA's agreement to revise the station site.

2-4

We believe that approximately two (2) months after entering into the MOU, MTA launched a "sham" summary environmental review process by:

2-5

(a) Forever capping parking at the Universal City Station Site to 880 spaces, although the earlier SEIR/SEIS had promised an initial 1,175 parking spaces at the station and that this amount would be increased through construction of an on-site parking structure to 2,500 spaces if funding for such a structure could be obtained. The MOU prohibits the MTA not only from increasing the amount of parking but from ever constructing anything other than surface parking;

2-6

(b) Construction of new freeway on-ramp and off-ramp never studied in the original environmental review. The potential effects on traffic circulation created by these modifications of the 101 freeway are not mentioned in the Initial Study prepared by MTA;

2-7

James L. Sowell, Manager
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(c) Requiring the taking of park land and a portion of Campo de Cahuenga, a State Historic Site, which will be used in whole or in part for roadway of the Revised Project; the environmental consequences of these acquisitions were never reviewed in the original and supplemental FEIR/FEIS; and

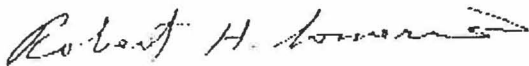
2-8

(d) Giving MCA carte blanche as to the construction of an undefined "People Mover," the environmental consequences of this link-up to the Metro Rail are not mentioned in the Initial Study.

2-9

I trust the above adequately sets forth Chelsea's objections to the modified initial study addendum with respect to this project. Certainly, if you have any further questions concerning our position, please call me.

Very truly yours,



Robert H. Somers
of KARNO, SCHWARTZ, FRIEDMAN, SHAFRON & WARREN
A Partnership Including Professional Corporations

RHS:brw

cc: Stanley Zucker
Norton S. Karno, Esq.

**TERRACE ON THE PARK SUBWAY GROUP
UNIVERSAL PARK HOMEOWNERS ASSOCIATION**
10735/10711 Bluffside Drive
Studio City, CA 91604

June 21, 1994

Mr. James L. Sowell
Manager, Environmental Compliance
Los Angeles County
Metropolitan Transportation Authority
818 West Seventh Street
Los Angeles, CA 90017

Re: Universal City Metro Rail Red Line Station

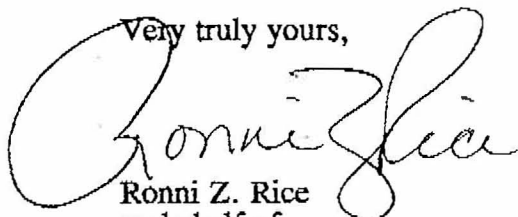
Dear Mr. Sowell:

On behalf of homeowners in Terrace on the Park and Universal Park Condominium Complexes, I wish to confirm to you our overwhelming support and acceptance of the Universal City Station improvements as described in the Addendum to the SEIS/SIER dated May, 1994.

As you are aware, we are the most severely and directly impacted group of homeowners in relation to the Universal City Metro Rail Red Line Station. The fact that you, your engineers and experts, have devised an alternate plan which includes the taking of our condo buildings, proves that the MTA has mitigated the environmental and other impacts to the Universal City area.

We are very anxious, of course, to have the project move forward. We have been held hostage in our homes for far too long! Again, thank you for all your assistance.

Very truly yours,



Ronni Z. Rice
on behalf of
Terrace on the Park Subway Group
Universal Park Homeowners Association
(818) 560-7098

3-1

SECTION 3

RESPONSES TO WRITTEN COMMENTS

This section provides written responses to the comments contained in the two letters received in response to the Modified Initial Study and Addendum. Each response listed here is identified by a corresponding number in Section 2. In those cases where a comment is repeated by a different commentor, the responses may refer to the discussion in the original response.

Letter 1: Erickson, Beasley, Hewitt & Wilson

- 1-1. Comments have been solicited from persons identified as owners of affected property (three hundred twenty-five notices were sent out). Notice of availability was also published in *The Daily News* on May 21, 1994. Even though an Addendum is not required to be circulated for public comment (CEQA Guidelines Section 15164), MTA offered the interested public an opportunity to comment.
- 1-2. While the MOU with MCA was approved in principle on February 23, 1994, the design changes required to implement that agreement have not previously been adopted or approved as a part of the project. No discretionary approvals have yet been given. Even if the Addendum should have been considered on or prior to February 23, 1994, MTA is still responsible for evaluating the changes in design under CEQA.

The MOU specifically states that conditions agree to in principal by MTA and MCA are subject to the necessary state, federal and city approvals. Such approvals would include CEQA compliance.

Laurel Heights Improvement Association v. Regents (1988) 47 Cal. 3d 376;

Laurel Heights Improvement Association v. Regents (1993) 6 Cal. 4th 1112.

- 1-3. In the original project Lankershim Boulevard was proposed to be widened by 11 feet. Under the revised project, Lankershim Boulevard is proposed to be widened by 22 feet on the west side. This will result in about 8 lanes to accommodate local traffic.

Station drawings in Figures 2-34 and 2-35 of the 1989 SEIS/SEIR note that changes may be necessary during final design of the project. It is common to modify intersection and lane width configurations during final design as a part of plan check approval by the City of Los Angeles Department of Transportation (LADOT). Improvements incorporated in the Addendum were recommended by LADOT.

- 1-4. The proposed change adds a new Riverton on-ramp and off-ramp. The Riverton ramp and access roadway changes are mentioned in the project description of the Modified Initial Study. The original project included both an off-ramp from the 101 freeway and an on-ramp to the freeway via Universal Place. These functions are fulfilled by the new structures. The levels of traffic moved are not expected to differ from the original project levels.
- 1-5. The change approves in advance MCA's construction of a People Mover. See revised section 3-13d in the Modified Initial Study.
- 1-6. The changes to roadways make access easier to Universal Studios, with growth-inducing potential. The changes to the roadways are largely a substitute for the access roadway changes in the 1989 document that accommodated traffic from the road exiting the north side of Universal City facing Bluffside and Valley Heart Drives.

The changes to traffic and freeway improvements were recommended by LADOT to improve traffic access at the station to the public in general and not solely the patrons of Universal Studios. As such they constitute additional mitigation measures above those already identified in the 1989 SEIS/SEIR.

- 1-7. The purpose of the Metro Rail was never identified solely to "transport people from the Valley to downtown Los Angeles." The Metro Red Line project was intended to serve riders to and from San Fernando Valley (SFV) throughout the day and night. The Metro Rail system must serve all of the major employment and activity centers along its alignment, including Universal Studios. It is important to have multiple destinations along a rail transit line serving both commuters and local travellers.

The project is not the magnet that draws people to Universal Studios. Universal Studios is the magnet. Universal Studios is currently the second largest visitor-serving attraction in Southern California without the Metro Rail Project. The MTA must serve such a major use, and such service is entirely consistent with the policies of the MTA. The Red Line will still serve both stations in the SFV and link them to the rest of the rail and bus network in the region.

- 1-8. These proposed project changes are a reasonable substitute for the original project. As mentioned in the project description, they reduce the undesired impact on the Racquet Club and accede to the request of Bluffside residents to take their property.

1-9. While the 1989 SEIR/SEIS on page 2-1-39 does show initial parking levels at 1,175 plus 40 kiss-and-ride spaces, the drawings of the station area on pages 2-1-42 and 2-1-43 indicate a total of 880 parking spaces.

The figure of 1,175 spaces on page 2-1-39 appears to be derived from the December 1983 FEIS. On page 2-33, Table 2-2 shows 1,175 park-and-ride plus 40 kiss-and-ride spaces initially. Apparently, these figures were

transposed to the 1989 document without allowing for the reductions in parking spaces reflected in the revised drawings on pages 2-1-42 and 2-1-43. The 1989 drawings show fewer spaces than in 1983 because the larger access roadway reduced the space available for parking.

- 1-10. The MOU does not prohibit a parking garage constructed in connection with one or more joint development projects. The commentor incorrectly assumes that MTA has abandoned the conservative, 90% = full occupancy assumption. See the revised discussion under "Parking" in Section 3-13b, page 3-10 of the Modified Initial Study.
- 1-11. Parking impacts are ameliorated by the transit system itself, since some people who will arrive at the Universal Station will do so by Metro Rail. This decrease in demand has not been taken into account in any of the previous studies and is an assumption which tends to result in an overestimate of parking deficiencies. Contrary to the commentor's contention, CEQA does not require an overestimate or upward bias of environmental impact.
- 1-12. During the MTA discussions with MCA, they have indicated that there is an opportunity to share their parking facilities with transit users. The MTA is confident that arrangements can be made in the future. Universal Studios currently provides over 22,000 parking spaces which are used most heavily in the summer months after 10:00 a.m. and on weekends and evenings. Metro Rail use is heaviest on weekdays in the a.m. and p.m. rush hours. The opportunity for shared parking should not be ignored as a strategy to reduce parking demand and increase parking utilization. Duplicate parking structures that are used at different times are a waste of taxpayer dollars and has therefore not been recommended in the Modified Universal City Plan. Future parking is not precluded from occurring as shared parking with future development that would require discretionary CEQA approvals at that time.
- 1-13. With respect to Regulation 15, approximately four-fifths of projected demand for parking in year 2000 in the Universal City Station area is non-Metro Rail related. Only one-fifth is Metro Rail related. Regulation 15 causes a shift in employee demand for parking away from cars and toward a variety of other modes including Metro Rail, buses, carpools, and vanpools. Accordingly, the overall pool of non-Metro Rail parkers is much larger than the pool of Metro Rail parkers at this location. This larger pool will be diminished by employees who shift to a variety of modes, whereas the smaller pool will be increased only by those who shift to Metro Rail. For these reasons, Regulation 15 is expected to reduce the demand for parking by Universal City employees by a larger number than it would increase the demand for parking (from Metro Red Line).
- 1-14. See response to comments 9 and 10. Also, see the revised discussion under "Parking" in Section 3-13b, page 3-10 of the Modified Initial Study.

- 1-15. The housing situation in the San Fernando Valley has changed as a result of the January, 1994 earthquake. It is true that the earthquake destroyed dwelling units, but anecdotal information from media reports indicates that the demand for housing in the Valley has dropped by a much greater factor. Additionally, the Modified Initial Study indicates that future joint development for the Universal City Station area may incorporate commercial space, housing, retail and parking in mixed use projects.
- 1-16. The acquisition of park land in South Weddington Park and the Campo de Cahuenga is looked on favorably by the Los Angeles Department of Recreation and Parks (LADRP). MTA expects them to support the street widening in exchange for additional land and facility improvements to be negotiated. The replacement of land from these parks by project land will allow the LADRP to provide much needed parking dedicated to the Campo de Cahuenga, while restoring or enhancing the landscaped area around the replica building. At South Weddington Park, if land is required for road improvements, it will be replaced from project land as indicated in Section 3-19, page 3-16 of the Modified Initial Study.
- 1-17. The commentor has incorrectly described the proper scope for the use of addenda reports. CEQA Guidelines Section 15164 provides for the use of an addendum where only "minor technical changes or additions are necessary to make the EIR under consideration adequate under CEQA." Because the Modified Initial Study has concluded that there are no new significant adverse environmental impacts that were not previously discussed in project environmental documents, the addendum is appropriate.

The total costs for the Metro Red Line Segment 3 are estimated to be approximately one and one-half billion dollars. The \$52 million figure quoted by the commentor would represent about 4% of this total cost.

However, the commentor is incorrect in at least one of her figures. The roadway improvements are estimated to cost \$3.8 to \$4.8 million, not \$16 million. The parking structures will not be built and therefore would not add to project costs.

Letter 2: Karno Schwartz, Friedman, Shafron & Warren

- 2-1. The Resolution of Necessity to acquire the property occupied by Chelsea Studios was adopted on August 25, 1993. The recommended changes to the Universal City Station, if approved, do not render the property unnecessary. Instead, the property is needed under either design.
- 2-2. Discussions between MTA and MCA over MCA's request to relocate the station began in September, 1993. These discussions were the subject of various public meetings of MTA's Planning and Programming Committee as well as the full MTA Board, beginning in December 1993.

2-3. See response to Comment 1-2, and the revised Modified Initial Study, Section 3-13.

2-4. The MOU was item 25 on the agenda for MTA's February 23, 1994 meeting, which was available to the public.

Attorneys representing the Lucas interests were present and presented testimony on behalf of their client regarding the MOU under consideration. Speakers representing other interested property owners were also present to give their comments on the record. Following full discussions of these issues, the MTA Board approved the concept improvements described in the MOU subject to necessary approvals.

2-5. See response to Comment 1-2.

2-6. See response to Comments 1-9 and 1-10.

In addition, the MTA can provide additional parking to meet the Universal City station future demand in a number of ways. This would include shared parking in structures across the street at Universal Studios, shared parking with future joint development, parking along the east-west rail line or people mover system. The MTA can also manage the parking demand by providing incentives for vanpools and carpools as a way to reduce single occupant drivers who exacerbate the demand for large parking garages.

2-7. See response to Comment 1-4.

A direct northbound freeway on-ramp from the northeast side of the access road was studied in the 1983 and 1987 environmental documents but was deleted in 1989. Following further review by LADOT and Caltrans, the ramp has been reincluded in the site plan to provide improved mitigation of EIS-identified traffic impacts. Such changes are within the scope of changes that can occur during final design of the project, if needed.

2-8. See response to Comment 1-16.

2-9. See response to Comment 1-5.

Letter 3: Terrace on the Park Subway Group, Universal Park Homeowners Association

3-1. This letter was received after the close of the comment period but is included with other comments for information.